

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AUTOMOBILE CLUB OF NEW YORK, INC. :
d/b/a AAA NEW YORK and AAA NORTH :
JERSEY, INC., : 11 Civ. 6746
 : (RKE) (HBP)
 :
Plaintiffs, :
 :
-against- : **NOTICE OF MOTION TO**
 : **COMPEL DISCOVERY**
 :
THE PORT AUTHORITY OF NEW YORK :
AND NEW JERSEY, :
 :
Defendant. :
-----X

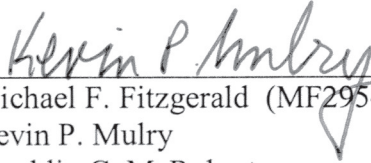
PLEASE TAKE NOTICE, that upon the accompanying papers, and all proceedings had herein, plaintiffs Automobile Club of New York, Inc. d/b/a AAA New York and AAA New Jersey, Inc. will move this Court before the Honorable Henry B. Pitman at the United States District Court, at 500 Pearl Street, New York, New York, on a date to be determined by the Court, for an order pursuant to Federal Rules of Civil Procedure 26 and 37(a), for an order compelling the production of documents withheld by defendant pursuant to the deliberative process privilege, and for such other and further relief as may be just, proper, and equitable.

Dated: New York, New York
August 6, 2013

Respectfully Submitted,

FARRELL FRITZ, P.C.

By:


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